

10:40:57 1 A. Yes.

10:40:58 2 Q. Okay. You don't need to tell me what you do
10:41:02 3 or don't do. I'm just curious whether or not that's
10:41:07 4 available on your desktop.

10:41:08 5 A. It's available, but --

10:41:10 6 Q. Okay. What other databases do you have on
10:41:14 7 your desktop today at global markets?

10:41:21 8 A. Just basically the CLLI code lookup and --
10:41:31 9 let's see -- usually that's in probably the -- the fiber
10:41:42 10 designs, the SONET ring designs that's been designed and
10:41:48 11 published that I can pull.

10:41:52 12 Q. Those are current facilities in the field,
10:41:55 13 SONET rings?

10:41:56 14 A. The ones we are trying to get constructed,
10:42:00 15 they draw a picture out of -- whether it's in PowerPoint
10:42:04 16 or Unix, and I'm going to the system and print a copy of
10:42:09 17 that out for my book.

10:42:10 18 Q. All SWBT rings or just the ones you're working
10:42:15 19 on?

10:42:15 20 A. Ones they put in there is available for -- to
10:42:17 21 be pulled, but I usually just pull the one that I'm
10:42:20 22 working on.

10:42:21 23 Q. So if you were curious about the design of a
10:42:25 24 ring that you were not involved with, say a building in
42:27 25 Dallas, but you heard something interesting about it and

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10:42:30 1 you want to go look at it, could you pull up the route
10:42:33 2 of that SONET ring?

10:42:34 3 A. Not in Dallas.

10:42:35 4 Q. Is your data just listed to Houston?

10:42:42 5 A. Only Houston.

10:42:43 6 Q. And what is this database called?

10:42:46 7 A. TNESSH.

10:42:48 8 Q. T-N-S --

10:42:51 9 A. T-N-E-S-S-H.

10:42:54 10 Q. T-E --

10:42:55 11 A. Excuse me. Let me back up.

10:42:58 12 The database is NDS, just NDS. It's
10:43:03 13 simple. I'm getting terms confused.

10:43:12 14 Q. NDS is the name of the database?

10:43:13 15 A. That's the database.

10:43:15 16 Q. And that allows you to pull up most all of the
10:43:18 17 SONET rings that are in Houston?

10:43:20 18 MR. HARTLEY: Object to form.

10:43:25 19 Q. So you can view them?

10:43:26 20 A. Yes, I can look at what I need to pull for
10:43:29 21 that project or job that I'm working on.

10:43:32 22 Q. Now, I'm just -- I'm asking you about the
10:43:34 23 database itself. The database itself is supposed to
10:43:39 24 include the SONET rings in Houston, correct?

10:43:41 25 A. Yes.

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10:43:42 1 Q. And there's no restriction built into the
43:46 2 database that would keep you from pulling up SONET rings
10:43:49 3 that you are not working on, is there?

10:43:52 4 A. Correct.

10:43:58 5 Q. Okay. What level of detail is on the
10:44:01 6 description of the SONET ring, or does it show about the
10:44:05 7 ring?

10:44:12 8 A. Just basically the fibers and the nodes. It's
10:44:18 9 just a block diagram. That's all it is.

10:44:21 10 Q. So you would see the fibers and all the nodes
10:44:24 11 connected to the fibers?

10:44:26 12 A. That they drew on that diagram, right.

10:44:29 13 Q. Right. And the node would include like COs,
:44:32 14 POPs, customer prems, stuff like that?

10:44:35 15 A. If that was part of that ring.

10:44:37 16 Q. Right. Those would be common nodes to see on
10:44:40 17 the diagram?

10:44:41 18 A. Right, just only for the ring that we are
10:44:45 19 building, not the rest of the network.

10:44:46 20 Q. Right. But if a fiber goes through a node,
10:44:49 21 that node should be on the diagram?

10:44:51 22 A. Yes. Yes.

10:44:54 23 Q. Okay. So other than TIRKS, CLLI Lookup and
10:44:58 24 NDS, what else do you have on your desktop?

45:07 25 A. Business Objects. That's a form of a TIRKS

10:45:13 1 access.

45:14 2 Q. That's sort of the user overlay on the TIRKS
10:45:22 3 database that allows you to run reports?

10:45:25 4 A. Run reports, right.

10:45:26 5 Q. And give me an example of how that works. If
10:45:29 6 you wanted to see all -- an inventory of all fiber-based
10:45:36 7 service to a building, how would you do that using
10:45:39 8 Business Objects?

10:45:44 9 A. The way that report works is I would have to
10:45:46 10 know the ring to the building, or the CLLI code to the
10:45:57 11 building, then I would have to look at each one of them
10:46:01 12 because -- individually. The main thing I use it for is
10:46:05 13 to do the SONET -- the drawing that's in -- similar to
10:46:11 14 the one that I see in the other system. It just draws
10:46:14 15 it for me in a little bit different format, so...

10:46:19 16 Q. TIRKS will give you a design layout?

10:46:20 17 A. It just gives you a listing. That's all it
18 is.

10:46:24 19 Q. A listing of all the nodes?

10:46:25 20 A. Right.

10:46:26 21 Q. To a SONET ring?

10:46:28 22 A. Right, but it doesn't draw any pictures.

10:46:31 23 Q. How do you pull up that information for a
10:46:36 24 given SONET ring? What minimum information do you need
46:38 25 to pull that information up for the SONET ring?

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10:46:41 1 A. You need the SONET ring identifier, the SCID,
10:46:51 2 S-C-I-D.

10:46:51 3 Q. And how do you get the SCID for SONET -- SONET
10:46:56 4 ring identifier?

10:46:57 5 A. It's either been given to me as part of the
10:47:00 6 project or I have to ask someone for what it is at that
10:47:03 7 location.

10:47:04 8 Q. And who do you typically ask?

10:47:07 9 MR. HARTLEY: Object to form.

10:47:10 10 Q. OSP planner?

10:47:14 11 A. Could be. NSS is the other opportunity.

10:47:25 12 Q. Okay. If someone wants to know whether or not
10:47:27 13 there's a DS3 available at a certain customer's POP, how
10:47:32 14 do you use Business Objects to give them an answer?

10:47:39 15 A. Today, I mean -- today I don't do that,
10:47:47 16 because I only build on cases that's come to me. If you
10:47:52 17 go back to NSS, it was just a quick -- when we were
10:47:57 18 asked -- when they would ask to just see if the facility
10:48:01 19 was available and we would give them that answer, if it
10:48:06 20 would -- likelihood if it would fund or not fund because
10:48:11 21 the facilities were available. The problem was I
10:48:15 22 discouraged it after a point, because too many people
10:48:19 23 called. It got abused.

10:48:21 24 Q. People calling, just asking is this facility
48:24 25 available, is this facility available?

10:48:26 1 A. Basically, we said it's got to come through
48:29 2 WALRSS.
10:48:29 3 Q. And those sales people were calling you?
10:48:32 4 A. Right.
10:48:32 5 Q. And -- now, why would they want that
10:48:34 6 information?
10:48:41 7 A. Just to know the likelihood of whether it's
10:48:44 8 going to fund or not.
10:48:45 9 Q. Right, because if the facility is available,
10:48:48 10 it's much more likely to fund, correct?
10:48:50 11 A. Yes.
10:48:51 12 Q. So if they can quickly find out whether or not
10:48:53 13 a facility is available by making a phone call to Ed
10:48:56 14 Johnson, then they have a good idea whether or not to
10:49:02 15 chase the deal or not?
10:49:03 16 A. Yes.
10:49:04 17 Q. Okay. And you had so many sales people
10:49:09 18 calling you, though, that you finally told them to use
10:49:12 19 WALRSS?
10:49:12 20 A. And the rest of the group did, too.
10:49:14 21 Q. The rest of NSS?
10:49:16 22 A. Uh-huh.
10:49:17 23 Q. Because all the sales people were calling NSS?
10:49:19 24 A. Right.
49:25 25 Q. Right now, if a salesperson has a customer and

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10:49:30 1 that customer wants to do, say, a point-to-point DS3 to
49:35 2 another carrier's POP, so they want to know if a certain
10:49:40 3 facility is available or certain capacity is available
10:49:46 4 at that other carrier's POP, how do they find out that
10:49:49 5 information?

10:49:50 6 A. Submit a case.

10:49:51 7 Q. An inquiry?

10:49:52 8 A. Inquiry, right.

10:49:53 9 Q. In WALRSS?

10:49:54 10 A. Right.

10:49:54 11 Q. So a retail salesperson or a special access
10:49:57 12 salesperson would put in a WALRSS case saying, let my --
10:50:00 13 basically filling in the fields to indicate that his
10:50:03 14 customer wants to know whether or not they can do a
10:50:05 15 point-to-point to this third party, is there capacity
10:50:08 16 available at that third party?

10:50:09 17 A. Right.

10:50:10 18 Q. That's right?

10:50:11 19 A. Correct.

10:50:12 20 Q. Then NNS would get the answer through its
10:50:15 21 resources and in response to the inquiry say what?

10:50:18 22 A. Facilities available.

10:50:20 23 Q. Okay.

10:50:21 24 A. 10-day or 15-day interval, whichever was the
50:24 25 rule at the time.

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10:50:27 1 Q. Is that a -- do those type of inquiries to
50:34 2 determine whether or not capacity is available at a
10:50:36 3 third party happen on a regular basis?

10:50:39 4 A. Yes.

10:50:39 5 Q. And is it your understanding, then, that the
10:50:41 6 salesperson takes that information and let's the
10:50:44 7 customer know that, yes, that circuit would be possible,
10:50:47 8 go ahead and place your order?

10:51:05 9 MR. HARTLEY: Objection, form.

10:51:06 10 A. At the time we get the order, usually he has
10:51:10 11 an order, too.

10:51:10 12 Q. I'm talking about when he gets the inquiry,
10:51:14 13 not an order.

:51:15 14 A. I used it incorrectly.

10:51:15 15 When he places the inquiry, he probably
10:51:17 16 has the order on his desk already. More than likely,
10:51:22 17 his -- it's just a matter of formality to verify that he
10:51:27 18 can release it.

10:51:28 19 Q. So he would tell the customer, yes, the
10:51:31 20 facility at that third party is available, we are going
10:51:34 21 to go ahead and release the order if that's okay with
10:51:37 22 you?

10:51:37 23 A. Right.

10:51:37 24 Q. And the customer would say, great, go ahead.
51:41 25 Is that how that process works?

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10:51:42 1 A. Yes, right.

10:51:46 2 Q. Okay. What about JMOS?

10:52:04 3 A. I have no access to it. I really don't know

10:52:07 4 how it works. It came in after I left outside plant

10:52:13 5 engineering.

10:52:18 6 Q. I'm sorry. To finish up on business objects

10:52:23 7 and TIRKS. You can use TIRKS to determine all lit fiber

10:52:30 8 service to a building, correct?

10:52:35 9 A. If it has equipment on it.

10:52:39 10 Q. That's why I say lit service. So it's lit

10:52:42 11 service, it has equipment on it. TIRKS has that

10:52:46 12 information in it, correct?

10:52:47 13 A. Correct.

10:52:50 14 Q. And TIRKS also will tell you what equipment is

10:52:55 15 at the customer premise, correct?

10:53:01 16 A. In its generic terms, yes.

10:53:04 17 Q. And you can also determine from TIRKS what

10:53:08 18 capacity is being unused at the customer premise?

10:53:12 19 A. Yes.

10:53:19 20 Q. Can you track down all that information with

10:53:22 21 the physical address of the customer?

10:53:33 22 A. Sometimes. You usually need the equipment

10:53:37 23 location code or the CLLI code.

10:53:39 24 Q. So you can definitely track it down with the

53:42 25 CLLI code, right?

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10:53:43 1 A. That's the only way TIRKS will be able to
53:46 2 respond.

10:53:46 3 Q. And the way you get the CLLI code is you use
10:53:49 4 the CLLI lookup feature?

10:53:52 5 A. Right.

10:53:53 6 Q. So it just adds one step to your process,
10:53:57 7 right? You get a CLLI from the CLLI lookup database and
10:54:02 8 then you put it in the TIRKS.

10:54:03 9 A. Yes, but that may not be the only person --
10:54:06 10 the only CLLI code at that building.

10:54:08 11 Q. You may need to look at other CLLI codes,
10:54:11 12 also?

10:54:11 13 A. Uh-huh.

:54:12 14 Q. Is that correct?

10:54:12 15 A. Right.

10:54:18 16 Q. Any other databases available to you on your
10:54:21 17 desktop at global markets?

10:54:26 18 A. Not of any consequence.

10:54:30 19 Q. Anything that would allow you to determine
10:54:34 20 facility based information?

10:54:35 21 A. No.

10:54:36 22 Q. Okay. Do you have to put a password in to use
10:54:47 23 TIRKS?

10:54:47 24 A. Yes.

54:47 25 Q. Do you have to put a password in to use the

10:54:51 1 CLLI lookup?

54:51 2 A. No.

10:54:57 3 Q. What is a dark fiber planning tool?

10:55:03 4 A. I'm not familiar with that.

10:55:05 5 Q. You've never heard of that?

10:55:07 6 A. No, I have not.

10:55:09 7 Q. Have you ever heard of that term?

10:55:10 8 A. It's new to me right now.

10:55:13 9 Q. Okay. Do you know -- I want to turn your

10:55:21 10 attention now to a different area of the business, and

10:55:25 11 that's CLEC's ordering facilities from SWBT. All right?

10:55:31 12 A. Okay.

10:55:33 13 Q. How does a CLEC find out whether or not

10:55:36 14 facilities are available?

10:55:44 15 A. They go through the LSC and the LSC submits a

10:55:49 16 case in WALRSS, or through their regional manager,

10:55:53 17 whichever it may be. That's the way it was being done a

10:55:58 18 year-and-a-half, two years ago.

10:56:00 19 Q. Okay. Have you heard of any changes made to

10:56:04 20 that --

10:56:04 21 A. No.

10:56:05 22 Q. -- process?

10:56:07 23 So the CLEC orders through the LSC or

10:56:13 24 makes an inquiry through the LSC; is that right?

56:17 25 A. Yes.

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10:56:17 1 Q. And then the LSC puts it into WALRSS?

56:21 2 A. Right.

10:56:21 3 Q. And the WALRSS shoots to NSS?

10:56:23 4 A. Correct.

10:56:23 5 Q. And NSS -- what does NSS do next?

10:56:27 6 A. Determines if it's outside plant or IFCPC

10:56:31 7 involvement, one or both, and then send the request to

10:56:35 8 the appropriate group.

10:56:36 9 Q. Now, when NSS receives that WALRSS inquiry,

10:56:40 10 does it know it's for a CLEC?

10:56:42 11 A. Yes.

10:56:42 12 Q. And how does it know it's for a CLEC?

10:56:48 13 A. The way it was being done it had a W on the

:56:51 14 case for wholesale.

10:56:58 15 Q. Okay. And it -- W for wholesale meant CLEC?

10:57:09 16 A. Generally. I wouldn't -- usually the people I

10:57:11 17 would receive those cases from were just the LSC that

10:57:16 18 had the W on it.

10:57:17 19 Q. So if something came from the LSC, which SWBT

10:57:20 20 retail doesn't use --

10:57:21 21 A. Right.

10:57:21 22 Q. -- and it had a W on it, you're almost certain

10:57:24 23 that was a CLEC order?

10:57:26 24 A. Pretty certain.

57:30 25 Q. Okay. Now, when you heard NSS, would those

10:57:34 1 orders -- were there a different operating set of
57:36 2 procedures for those orders?

10:57:38 3 A. No.

10:57:39 4 Q. Were they handled any differently?

10:57:41 5 A. They were handled no differently. They were
10:57:46 6 the same interval, the same time frame that we were
10:57:49 7 doing them.

10:57:53 8 Q. And speaking of intervals, I forgot to ask you
10:57:58 9 this. When you were at NSS for those two some odd
10:58:02 10 years, what was your normal response interval on a
10:58:05 11 WALRSS inquiry back to special access sales people or
10:58:09 12 retail sales people?

10:58:10 13 A. Four to five days.

58:13 14 Q. It would take you four to five days just to --

10:58:15 15 A. That's the interval I had available.

10:58:17 16 Q. Yeah, right. And I'm not asking what
10:58:21 17 interval -- what maximum amount of time you had.

10:58:25 18 A. I wouldn't get it back from the other groups
10:58:29 19 until it was due.

10:58:30 20 Q. Okay.

10:58:30 21 A. They would --

10:58:31 22 Q. We heard testimony yesterday from the special
10:58:34 23 access person who said at least 50 percent of the time
10:58:36 24 he got back from NSS his WALRSS orders within 48 hours.

58:47 25 MR. HARTLEY: Object, form.

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10:58:49 1 Q. Does that sound right to you?

10:58:51 2 A. Only if we got a reply back in that short of
10:58:55 3 time.

10:58:56 4 Q. Right. I'm assuming -- I know you're
10:58:59 5 dependent upon other people.

10:59:00 6 A. I can only reply when they reply back to me.

10:59:03 7 Q. So I'm just curious what the average response
10:59:06 8 time is, NSS getting back to the sales people.

10:59:12 9 A. It was usually the four-day interval that I
10:59:15 10 had, and due to my workload, I had to pretty well work
10:59:19 11 that -- I didn't have too much time to do things out of
10:59:24 12 the norm.

10:59:25 13 Q. Very good.

10:59:33 14 So then when NSS received that CLEC
10:59:35 15 request, they would make the decision whether to send it
10:59:37 16 to OSP, IFCPC or both?

10:59:41 17 A. Correct.

10:59:41 18 Q. And they would send it. And when it came back
10:59:44 19 from the respective department it was sent to, what
10:59:47 20 information came back to NSS?

10:59:50 21 A. That they either had to build something or the
10:59:53 22 facilities were available.

10:59:56 23 Q. Okay.

10:59:56 24 A. Basically a routing or a -- sometimes it would
00:02 25 be just a yes or no that it would be available and a

11:00:07 1 generic routing.

00:07 2 Q. Did they give you all the costing information?

11:00:10 3 A. If it was plugs involved, no.

11:00:13 4 Q. You said plugs before. What are plugs?

11:00:16 5 A. The equipment requires a plug to be able to

11:00:19 6 hand that service off to the equipment.

11:00:21 7 Q. What is the more technical term for a plug?

11:00:24 8 Are you talking about cards?

11:00:25 9 A. Cards.

11:00:26 10 Q. Okay. So you -- and when I had talked about

11:00:29 11 changing electronics earlier, that would be one example,

11:00:33 12 would be switching out the card?

11:00:35 13 A. Correct.

11:00:36 14 Q. OC-12 to an OC-48 card?

11:00:40 15 A. No, I'm talking about adding DS3 cards or DS1

11:00:44 16 cards in the equipment.

11:00:45 17 Q. Okay.

11:00:46 18 A. If you're changing -- what you referred to

11:00:48 19 that's a project.

11:00:49 20 Q. Because it's a higher level?

11:00:51 21 A. Different equipment.

11:00:53 22 Q. Okay. It's just a different level MUX,

11:01:03 23 though, right, different level hand-offs, different

11:01:07 24 level MUXes?

01:08 25 A. Different MUX altogether.

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11:01:10 1 Q. Right.

01:10 2 A. For the two that you gave the example for.

11:01:13 3 Q. And that -- let me understand. So if OSP got

11:01:21 4 a request and all OSP had to do was, say, reconfigure a

11:01:25 5 DS3 to hand off 28 DS1s, they would just say, yeah,

11:01:30 6 facilities are available?

11:01:31 7 A. Correct.

11:01:31 8 Q. Because that's such a minor operation, they

11:01:34 9 wouldn't deem that to be a capital-type event?

11:01:37 10 A. Yes.

11:01:40 11 Q. Okay. And does OSP -- so they must do that on

11:01:45 12 a fairly regular basis, swap out DS3 plugs and DS1 plugs

11:01:55 13 to configure the box for the order coming through?

11:01:55 14 A. Their answer would be just saying to me that

11:01:57 15 the facilities are available. It would be up to me to

11:02:00 16 figure out -- or CPC or IFCPC to say what plugs had to

11:02:06 17 be changed. They wouldn't necessarily get to that

11:02:10 18 detail.

11:02:11 19 Q. They may not even tell you that plugs need to

11:02:14 20 be changed, right?

11:02:15 21 A. Correct.

11:02:16 22 Q. Because that's just not a big deal to them?

11:02:18 23 A. They would look in their -- the tools they

11:02:25 24 have and say, there was a spare slot available. How we

02:29 25 got it there, that was not their concern.

11:02:31 1 Q. But they would just send out a technician to
11:02:34 2 make that happen?

11:02:35 3 A. No, they wouldn't do anything.

11:02:37 4 Q. A SWBT technician would be sent by someone to
11:02:41 5 make that happen?

11:02:41 6 A. Only when the order flowed through the system.

11:02:44 7 Q. Right. At the time the order came through,
11:02:46 8 they -- it would be common to swap out a DS3 plug for 28
11:02:52 9 DS1 plugs, if that was what the order required?

11:02:55 10 A. If the system would handle it at that time,
11:02:57 11 yes, right.

11:03:00 12 Q. Is that a common event, swapping out plugs to
11:03:04 13 make an order happen?

11:03:07 14 A. We have done -- I've done it on a regular
11:03:09 15 basis where we have had to convert or -- reinventory the
11:03:14 16 equipment to change from DS3 to DS1.

11:03:19 17 Q. And does that happen for both SWBT retail
11:03:23 18 sales and CLECs?

11:03:33 19 A. I can say for retail sales probably on a
11:03:37 20 regular basis -- I mean, it happens. Now, on the CLEC,
11:03:41 21 usually I didn't get that kind of request.

11:03:44 22 Q. What kind of request?

11:03:46 23 A. It was basically a point-to-point request from
11:03:49 24 CO to CO.

11:03:51 25 Q. Interoffice type stuff?

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11:03:52 1 A. Right.

11:03:53 2 Q. But on a loop, would they swap out the same
11:03:57 3 plugs for a CLEC like they do for retail sales?

11:04:00 4 A. Oh, yes.

11:04:01 5 Q. Okay.

11:04:02 6 A. Once the order was passed through the system.

11:04:04 7 Q. That would not be uncommon?

11:04:06 8 A. No.

11:04:06 9 Q. Okay.

11:04:22 10 THE WITNESS: Can we take another break?

11:04:24 11 MR. CRAWFORD: Sure.

11:04:24 12 (Recess 11:04 to 11:16 a.m.)

11:16:35 13 MR. CRAWFORD: Mr. Johnson, we are back
11:16:37 14 on the record.

11:17:01 15 (Record read.)

11:17:14 16 Q. In your position in global markets, sir,
11:17:18 17 that's not really an engineering or network position, is
11:17:22 18 it?

11:17:22 19 A. No.

11:17:23 20 Q. You're more affiliated with the marketing
11:17:25 21 side, correct?

11:17:27 22 A. I lean that way, but I'm not in marketing.

11:17:31 23 Q. Right. You're not officially in marketing,
11:17:34 24 but you're closer to marketing than you are to
17:37 25 engineering and network, correct?

11:17:38 1 A. I'm in customer care is what they refer to.

17:41 2 Q. Who else is in customer care, what other
11:17:44 3 groups?

11:17:45 4 A. Frankly, that's it. It's all the project
11:17:48 5 management side of the --

11:17:49 6 Q. Project management is deemed customer care.
7 Okay.

11:17:51 8 So tell me about the interaction you have
11:17:53 9 with the customers. How do you assist the customers
11:17:57 10 with that? When do you talk to them? When do you meet
11:17:59 11 with them? How do help them?

11:18:01 12 A. When I have a project handed to me and we need
11:18:03 13 to have either a site meeting or a -- a determination of
11:18:12 14 what the -- of the requirements they have to provide for
11:18:15 15 me to be able to do the project.

11:18:17 16 Q. Uh-huh.

11:18:18 17 A. Like power grounding, space.

11:18:22 18 Q. In your position in the global markets, since
11:18:25 19 you've been there two-and-a-half years or so, have you
11:18:27 20 been able to assist in the precontract sales process
11:18:31 21 with any customers? Have you been able to add value in
11:18:38 22 that regard?

11:18:38 23 A. There has been a -- an occasion, not often,
11:18:44 24 just like a presales.

18:46 25 Q. Now and then?

11:18:48 1 A. (Nods head)

18:49 2 Q. And how were you able to help?

11:18:54 3 A. Educate the marketing people on what -- how we

11:19:04 4 were either going to try to build it or how long it

11:19:07 5 would take us to build it or to advise them to maybe shy

11:19:11 6 away from that --

11:19:13 7 Q. Estimated completion date?

11:19:15 8 A. Just from site visit, saying we know with --

11:19:20 9 we have to deal with permits and other issues and it may

11:19:23 10 take longer this way versus the other way.

11:19:26 11 Q. Right.

11:19:26 12 A. Only because somebody else has said, hey, we

11:19:29 13 have got to do this and I would just add it to that

11:19:32 14 question and say okay.

11:19:35 15 Q. So you were actually able to go to a site

11:19:38 16 visit with a customer?

11:19:40 17 A. At their request.

11:19:41 18 Q. Right. And you were able to help discuss the

11:19:44 19 technical points of what they were looking at?

11:19:49 20 A. Not necessarily -- well, I could, but I left

11:19:52 21 that to the technical support person that's paid to do

11:19:56 22 that.

11:19:56 23 Q. Okay. Now, who would the technical support

11:20:00 24 person would be, if you were not the technical support

20:03 25 person?

11:20:04 1 A. He's the one that goes with the account
11:20:06 2 manager to -- to make that -- to make that determination
11:20:12 3 of what they are going to sell.

11:20:14 4 Q. Okay.

11:20:15 5 A. I mean, he would explain the details -- I
11:20:19 6 mean, they would obtain the details from the client or
11:20:24 7 the customer to which they would be able to know what
11:20:27 8 they were going to request.

11:20:30 9 Q. Okay. Is that the title of technical support
11:20:33 10 person or did they have a different title?

11:20:35 11 A. There's several. The one I deal with is a
11:20:40 12 DSS, a data sales support, the old term was a TSS,
11:20:48 13 technical sales support, but that's no long -- it
11:20:51 14 depends on what department you're in. It's even
11:20:54 15 different, and I couldn't even tell you what the one is
11:20:56 16 on the other side, because they told me the other day
11:20:58 17 and it made no sense to me.

11:21:00 18 Q. So the sales people sometimes to help make the
11:21:04 19 sale will bring a data sales support person with them to
11:21:07 20 the customer visit; is that correct?

11:21:08 21 A. Yes.

11:21:09 22 Q. And that's the person who helps them
11:21:12 23 understand and talk knowledgeably about all the
11:21:15 24 technical issues with the circuit or facilities the
21:18 25 client needs?

11:21:19 1 A. Right.

11:21:20 2 Q. Does that person work for global markets or

11:21:23 3 NSS or engineering or OSP or what?

11:21:26 4 A. They work for global markets.

11:21:27 5 Q. They work for global markets. They're

11:21:31 6 permanently assigned to global markets?

11:21:33 7 A. Right.

11:21:34 8 Q. And are they generally engineers, people that

11:21:37 9 came out of OSP, people that came out of NSS, what

11:21:40 10 type -- where do they come from?

11:21:44 11 A. The ones I'm dealing with right now come off

11:21:47 12 of -- either came off the street or have been in

11:21:50 13 marketing long enough to -- so they -- they have -- none

11:22:01 14 of those -- they don't have any of those -- discipline

11:22:04 15 and background at this point -- at this time.

11:22:07 16 Q. Okay. Now, how do they --

11:22:09 17 A. The ones I've been dealing with anyway.

11:22:11 18 Q. On a proposed sale, do they -- I'm talking

11:22:14 19 about these data sales support people. I would imagine

11:22:18 20 they are able to get information on available facilities

11:22:22 21 prior to making the call, right, so they can talk

11:22:26 22 knowledgeably about that?

11:22:27 23 A. Sometimes it's not the issue.

11:22:29 24 Q. I'm sorry?

22:30 25 A. I say sometimes it's not the issue. They will

11:22:32 1 have to come back to the customer. We have discouraged
22:35 2 them from giving an interval until they go through the
11:22:40 3 NSS process.

11:22:45 4 Q. Right. And that's all -- certainly the
11:22:50 5 interval given to a customer before the NSS process
11:22:53 6 would simply be an estimate, right?

11:22:56 7 A. Unfortunately. Sometimes it's taken as
11:22:59 8 gospel.

11:23:00 9 Q. Which gets everybody in trouble, right?

11:23:03 10 A. It makes for short-fused projects, which I
11:23:07 11 hate.

11:23:07 12 Q. Where do they get their interval estimate
11:23:10 13 from? They check on available facilities and what type
:23:13 14 of facilities would be needed?

11:23:15 15 A. Yeah, they would go basically through the same
11:23:18 16 process everybody else would go through, through the
11:23:24 17 WALRSS case and wait for that reply to come back.

11:23:27 18 Q. And I just want to understand how these data
11:23:32 19 sales support people do their job. If they're going to
11:23:35 20 go talk about making a prospective sale to a customer
11:23:39 21 that needs telecom facilities, one option at their
11:23:43 22 disposal would be to put in a WALRSS inquiry request to
11:23:46 23 NSS and get a feel for the available facilities that are
11:23:49 24 in the area?

23:52 25 A. Only -- when you say area, only for that

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11:23:55 1 specific location that they requested.

23:57 2 Q. Right. For -- assuming they already have a
11:24:01 3 circuit in mind that the customer is thinking about?

11:24:04 4 A. They would have to have a specific circuit or
11:24:07 5 they can't submit a WALRSS case.

11:24:09 6 Q. So if the data sales support person in global
11:24:12 7 markets wants to make a sale to one of these Fortune 500
11:24:16 8 customers and they're talking about a prospective
11:24:20 9 circuit, one option the data sales support person has is
11:24:23 10 to put a WALRSS inquiry into NSS to find out about
11:24:28 11 available facilities for that circuit?

11:24:30 12 A. Yes.

11:24:31 13 Q. Okay. Then he would take the information
:24:35 14 about whether or not facilities are available or near
11:24:40 15 available and would be able to talk more authoritatively
11:24:45 16 to the customer about the timing involved to get their
11:24:48 17 facilities up and running?

11:24:50 18 A. Yes.

11:24:55 19 Q. Based on your experience with NSS, sir, when
11:25:11 20 an order comes through WALRSS to NSS or an inquiry comes
11:25:16 21 through WALRSS to NSS and the facility is not available,
11:25:20 22 but it's already under construction, what does the
11:25:23 23 response say back to the salesperson?

11:25:30 24 A. I would not know that that is under
25:33 25 construction, unless it's one that I've answered

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11:25:36 1 previously. The answer may be the same as they would
11:25:39 2 get if it wasn't under construction.

11:25:44 3 Q. Okay. Now, we heard yesterday that sometimes
11:25:47 4 it would say, under construction, with an interval
11:25:50 5 May 1st.

11:25:51 6 A. Only if that person who answered the case was
11:25:54 7 privy to that information. If he wasn't aware that that
11:25:56 8 was happening -- there's multiple NSS people processing
11:26:04 9 cases and if that same person has processed that case
11:26:07 10 that's under construction, he would know it.

11:26:10 11 Q. So let me restate my question. If an SWBT
11:26:14 12 salesperson submits a WALRSS inquiry for a facility
11:26:18 13 check and the NSS person knows that that -- knows or
11:26:24 14 learns that that facility is not currently available,
11:26:27 15 but is currently under construction and will be built
11:26:30 16 out by June 1st, what will the NSS person tell the
11:26:34 17 salesperson?

11:26:36 18 A. It would fund and the facility would be
11:26:39 19 available after June 1st, date to be negotiated based on
11:26:44 20 that project.

11:26:45 21 Q. So if a facility's under construction and has
11:26:49 22 an estimated due date, NSS will relay that information
11:26:53 23 to SWBT sales people?

11:26:54 24 A. If we -- yeah, if we know what the due date
26:58 25 was --